

**To:** Rao, Kate[Rao.kate@epa.gov]  
**Cc:** Rumrill, Nancy[Rumrill.Nancy@epa.gov]; JAMES D WALKER[**Ex. 6 - Personal Privacy**]  
**From:** Jonathan Koplos  
**Sent:** Tue 11/15/2016 9:50:14 PM  
**Subject:** RE: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit  
Summary of Excelsior 11-8-16 meeting.docx

Hi Kate,

Please find attached Jim's summary notes of the November 8 call with Excelsior.

Let us know if you have any questions.

Jonathan

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**From:** Rao, Kate [<mailto:Rao.kate@epa.gov>]  
**Sent:** Wednesday, November 02, 2016 1:19 PM  
**To:** Jonathan Koplos <[Jonathan.Koplos@cadmusgroup.com](mailto:Jonathan.Koplos@cadmusgroup.com)>  
**Cc:** JAMES D WALKER [Ex. 6 - Personal Privacy]; Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>; Rumrill, Nancy <[Rumrill.Nancy@epa.gov](mailto:Rumrill.Nancy@epa.gov)>  
**Subject:** Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Jonathan – below is a new work initiation request under Contract No. EP-C-15-022, WA 1-90 for Excelsior. Please let me know if you have any questions. You have already confirmed that Jim will work on this project so I am cc'ing him on this email.

Nancy is the tech lead on this project and she will cc: you and me on all call logistics and tech review items.

See Task 5, section a. for info on upcoming call. I am still working out the logistics and will update you when I get more information.

Thanks. Kate

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**Contract No. EP-C-15-022, Workplan Assignment No. 1-90**

**R9 Tech Support for Implementation of the UIC Program – Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ1-FY-16-1**

**Task 4 (Project Technical Reviews) & Task 5 (Consultation)**

**Technical Direction**

**Background:** Excelsior Mining Company (Excelsior) has submitted a UIC area permit application to operate a Class III ISR copper mining facility in Chochise County, AZ.

On 3/24/2016, we issued a TDM requesting a technical review of Excelsior's Class III permit application. Cadmus submitted technical review comments on 6/8/2016 (see attached: Comments on the Excelsior Mining Arizona Gunnison Copper Project\_6-8-2016.docx). EPA utilized these comments to issue the attached Notice of Deficiency on 10/14/2016 to Excelsior. Excelsior has requested a conference call with EPA Region 9 to discuss the NOD.

**Under Task 5 (Consultation),** the contractor shall make available a staff person to consult, directly with EPA staff and/or on calls with EPA & applicant, on the Excelsior Class III permit application and supporting material.

- Material: Will be sent prior to call or discussed on call.
- Estimated LOE: **Ex. 4 - CBI** per call (includes prep time)
- Deliverable: Summary of consultation support -- noted in monthly progress report and if possible, within 5 working days of the conference call, send draft notes to EPA via email.

a. Call scheduled for Tuesday, November 8<sup>th</sup> from 8:30 am to 11:00 am. Pre-discussion and de-brief discussion may be requested (TBD) and will be organized by Nancy Rumrill as needed.

- Material to review: 6/8/2016 Cadmus comments and 10/14/2016 NOD.
- LOE: **Ex. 4 - CBI** (includes prep and calls)
- Deliverable: written summary of consultation provided on call.

**Under Task 4 (Project Technical Review),** the contractor shall provide technical review for revised/updated Excelsior Class III permit documentation and supporting material. The contractor shall incorporate any comments from EPA and shall provide a final draft to the EPA WACOR.

- Material: same as under Consultation Task and additional material as provided by the applicant.
- Estimated LOE: **Ex. 4 - CBI** per review.

- o Deliverable: Prepare written comments in a format agreed upon when tech review is requested.
- o Schedule: 1 – 2 weeks for each request unless noted otherwise.

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Kate Rao  
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